

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

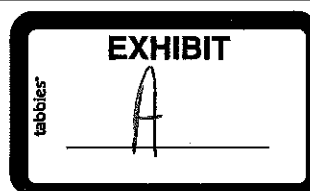
June 01, 2015  
1

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION

KENNETH E. SAVAGE, JR., )  
 )  
Plaintiff, )  
 )  
VS. ) 2:14-cv-02057-STA-dkv  
 )  
FEDERAL EXPRESS CORPORATION )  
d/b/a FEDEX EXPRESS, FEDEX )  
CORPORATION EMPLOYEES' PENSION )  
PLAN, FEDEX CORPORATION )  
RETIREMENT SAVINGS PLAN, )  
 )  
Defendants. )

VIDEOTAPE DEPOSITION  
OF  
KENNETH E. SAVAGE, JR.

JUNE 1, 2015



800.211.DEPO (3376)  
EsquireSolutions.com

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
2

STIPULATIONS

The videotape deposition of Kenneth E. Savage, Jr., is taken on this, the 1st day of June, 2015, on behalf of the Defendants, pursuant to notice and consent of counsel, beginning at approximately 9:25 a.m. in the offices of FedEx Express, 3620 Hacks Cross Road, Building B, Third Floor, Memphis, Tennessee 38125.

This deposition is taken pursuant to the terms and provisions of the Federal Rules of Civil Procedure.

The signature of the witness is waived.

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
3

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

JOSEPH A. NAPILTONIA, ESQ.  
HARDEE, MARTIN & DONAHOE, P.A.  
219 Third Avenue North  
Franklin, Tennessee 37064  
Phone: (615) 734-1199  
joenap@navyseallawyer.com

ON BEHALF OF THE DEFENDANTS:

DAVID P. KNOX, ESQ.  
FEDEX EXPRESS  
3620 Hacks Cross Road  
Building B  
Third Floor  
Memphis, Tennessee 38125  
Phone: (901) 434-9279  
david.knox@fedex.com

TERRENCE O. REED, ESQ.  
FEDEX EXPRESS  
3620 Hacks Cross Road  
Building B  
Second Floor  
Memphis, Tennessee 38125  
Phone: (9901) 434-8603  
terrence.reed@fedex.com

ALSO PRESENT:

Todd Davis, videographer

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
4

E X A M I N A T I O N I N D E X

KENNETH E. SAVAGE,

Examination By Mr. Knox	5
Examination By Mr. Napiltonia	290
Examination By Mr. Knox	331
Examination By Mr. Napiltonia	350

E X H I B I T S

Exhibit No. 1	20
Exhibit No. 2	94
Exhibit No. 3	100
Exhibit No. 4	118
Exhibit No. 5	129
Exhibit No. 6	134
Exhibit No. 7	139
Exhibit No. 8	144
Exhibit No. 9	180
Exhibit No. 10	189
Exhibit No. 11	199
Exhibit No. 12	206
Exhibit No. 13	208
Exhibit No. 14	212
Exhibit No. 15	221
Exhibit No. 16	222
Exhibit No. 17	230
Exhibit No. 18	231
Exhibit No. 19	232
Exhibit No. 20	238
Exhibit No. 21	239
Exhibit No. 22	246
Exhibit No. 23	265
Exhibit No. 24	266
Exhibit No. 25	279
Exhibit No. 26	306
Exhibit No. 27	317
Exhibit No. 28	352

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
60

1 A Yes, sir.

2 Q When you moved to the day shift, did your  
3 management structure change?

4 A I can't recall, but I seem to remember  
5 Troy moved to day shift as well. And I believe I  
6 retained Troy as my manager. I want to say that is  
7 true --

8 Q Okay.

9 A -- to the best of my recollection.

10 Q That is fine.

11 Do you recall having any manager  
12 other than Dana Jones or Troy Turnipseed as your  
13 direct supervisor?

14 A Bill Sallas was my manager when I very  
15 first got to the company, like, back in the 2001  
16 timeframe. I think it was Bill Sallas.

17 Q Okay. And he was your manager from your  
18 date of hire until --

19 A Until Dana Jones became a manager, I  
20 think.

21 Q Okay. So if I look at your management  
22 structure from the time you were hired until the  
23 time you left the company, it would be Bill Sallas,  
24 then Dana Jones, then Troy Turnipseed.

25 And to the best of your recollection

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
61

1 as you sit here today, nobody else in terms of  
2 direct managers. Is that right?

3 A No, sir. I can't remember anybody else.

4 Q Okay.

5 A Yes. That is correct.

6 Q That's correct. Okay. Thank you.

7 A Yes, sir.

8 Q I was wondering. You said you noticed  
9 your pension wasn't the same as these other  
10 individuals, and you can't remember who they were.  
11 Right?

12 A Yes, sir.

13 Q And this is in the 2012 timeframe.

14 A Yes, sir.

15 Q How did you notice that your pension  
16 wasn't the same as theirs?

17 A Through conversations.

18 Q Is that it?

19 A Yes, sir.

20 Q Did you review any documents?

21 A No, sir.

22 Q You didn't see their pension statements?

23 A No, sir.

24 Q Do you have access to any kind of  
25 information like that on-line?

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
74

1 manager over Troy Turnipseed and Matt Wickens and  
2 that group. Is that right?

3 A He is the HR rep for our department.

4 Q Okay. So Tommy Lott is the HR  
5 representative, would it be fair to say, for all the  
6 aircraft mechanics on the avionics line?

7 A I believe that was his title. Yes, sir.

8 Q Okay. So he had HR responsibilities for  
9 your entire group.

10 A Yes, sir.

11 Q But then, in terms of individual employees  
12 or individual mechanics, there would be groups of  
13 you that reported to certain managers. Right?

14 A Yes, sir.

15 Q Okay. Okay. Who did Troy Turnipseed and  
16 Matt Wickens and Dana Jones and all of that group --  
17 who did they report to?

18 A We had several senior managers at my time  
19 at Avionics line. Mike Anello -- I think I am  
20 pronouncing that correctly. He was the senior  
21 manager towards the end of my tenure here.

22 And Maureen Patton or -- Patton, I  
23 think. She had been the director of maintenance for  
24 quite some time. And then my next person in my  
25 chain-of-command was Scott Ogden and Greg Hall. And



KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
75

1 I think Larry Halp was above Mr. Hall, I believe.

2 And that is -- that is really -- as  
3 far as management goes, that is all I know.

4 Q Okay. So that is your vertical  
5 chain-of-command. Right?

6 A Yes, sir.

7 Q Okay. You say Mike Anello was your senior  
8 manager there at the end.

9 A Yes, sir.

10 Q Who was your senior manager before Mike  
11 Anello?

12 A Gosh. I can't remember his name.

13 Q You don't recall?

14 A I don't recall, sir.

15 Q That is fine.

16 A Patrick somebody. Patrick. I can't  
17 remember his last name.

18 Q Okay. Well, if it comes to you later on,  
19 just let me know.

20 A Yes, sir.

21 Q Going back to your Vanguard account, you  
22 said it was wrong, too.

23 A Yes, sir.

24 Q What was wrong with your Vanguard account?

25 A Well, when we started, like I said,



KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
202

1 Pablo Melgar, and Will McGowans.

2 A Correct.

3 Q Okay. And we have already talked about  
4 Alonzo Smith, and we have his deposition. Right?

5 A Right.

6 Q What do you know about Pablo Melgar?

7 A Pablo was actually -- at the time had  
8 transferred to Miami. He and I went to college  
9 together at Embry-Riddle while working at FedEx, and  
10 I had heard that he had, you know, been in trouble  
11 with the shipping violation.

12 And I called him immediately after  
13 being suspended, and he basically told me that, you  
14 know, he had been terminated back in May of 2012 for  
15 a shipping violation -- shipping policy violation  
16 and GFTed it on the second time and got his job  
17 back.

18 And he basically told me that his  
19 situation was he had an unauthorized use of his  
20 shipping benefit and that that is the violation he  
21 had.

22 Q Did he explain what kind of unauthorized  
23 use?

24 A Yes. He told me that he had let a  
25 girlfriend use his shipping account to ship some

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
203

1 items, and that is what was called into question.

2 Q Any idea how many items he had shipped?

3 A It was several, but I don't think the  
4 quantity was the issue. I think it was the fact  
5 that he didn't -- he let somebody use his account.  
6 That was the issue.

7 Q Okay.

8 A That is what he told me, and that is what  
9 FedEx had told him, I think.

10 Q Was he in Miami at the time?

11 A Yes, sir.

12 Q Do you know who he reported to?

13 A Dana Jones.

14 Q So Dana Jones was in Miami in 2012?

15 A He had evidently gotten transferred down  
16 there.

17 Q So everything you know about Pablo Melgar  
18 is based on what he told you?

19 A Yes, sir.

20 Q Okay.

21 A He actually helped me with my GFT because  
22 he had done two of them himself, and it hadn't been  
23 but several months prior.

24 Q Okay.

25 A He was a really big help in explaining the

KENNETH E. SAVAGE, JR.  
SAVAGE VS FEDERAL EXPRESS

June 01, 2015  
354

C E R T I F I C A T E

STATE OF TENNESSEE:  
COUNTY OF SHELBY:

I, Takiyah Sanders, Court Reporter and  
Notary Public, Shelby County, Tennessee, CERTIFY:

The foregoing proceedings were taken  
before me at the time and place stated in the  
foregoing styled cause with the appearances as  
noted.

Being a Court Reporter, I then reported  
the proceeding in Stenotype, and the foregoing pages  
contain a true and correct transcript of my said  
Stenotype notes then and there taken.

I am not in the employ of and am not  
related to any of the parties or their counsel, and  
I have no interest in the matter involved.

I FURTHER CERTIFY that this transcript is  
the work product of this court reporting agency and  
any unauthorized reproduction and or transfer of it  
will be in violation of Tennessee Code Annotated  
39-14-104, Theft of Services.

Witness my signature, this 14th day  
of June, 2015

*Takiyah Sanders*

Takiyah Sanders, CSR, LCR  
License No. 486